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ORIGINAL FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

AUG 17 2012

John A. Clarke, Executive Officer/Clerk
BY Gloria Robinson Deputy

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SUPERIOR COURT OF CALIFORNIA
FOR LOS ANGELES COUNTY

SAM LUTFI, an individual,
Plaintiff,

vs.

LYNNE IRENE SPEARS, an
individual; JAMES PARNELL
SPEARS, an individual; BRITNEY
JEAN SPEARS, an individual; and
DOES 1 through 25, inclusive,

Defendants.

Case No. BC 406904

RENEWED NOTICE TO PRODUCE
BRITNEY SPEARS, JAMES
PARNELL SPEARS AND ANDREW
WALLET AS WITNESS AT TRIAL

-and-

DEMAND FOR PRODUCTION OF
DOCUMENTS AT TRIAL

[C.C.P. §1987]

TRIAL: October 1, 2012
Time: 10:00 a.m.
Dept.: 71 (Hon. Soussan G.
Bruguera)

TO THE CONSERVATORS OF BRITNEY SPEARS AND TO THE
CONSERVATEE AND TO HER/THEIR COUNSEL OF RECORD HEREIN:

PLEASE TAKE NOTICE that Plaintiff Sam Lutfi hereby demands,
pursuant to C.C.P. §1987, the attendance of Britney Spears and Conservators
James Parnell Spears and Andrew Wallet at the trial of this action as
witnesses for Plaintiff. Plaintiff is prepared to enter into an agreement for said
witnesses to be "on call." Unless and until such an agreement is reached, this
demand requires the attendance of said witnesses commencing at 10:00 a.m.

RENEWED Notice to Produce Britney Spears as Trial Witness
and Demand for Production of Documents at Trial
LASC No. BC406904

Exhibit 16A

EXHIBIT 2

1 on October 1, 2012, in Department 71 of the Los Angeles Superior Court,
2 located at 111 N. Hill Street, Los Angeles, California.

3 **PLEASE TAKE FURTHER NOTICE** that, pursuant to C.C.P. §1987©,
4 Conservators James Parnell Spears and Andrew Wallet and the Defendant-
5 Conservatee, are instructed to produce the documents identified in Exhibit
6 "A" at the trial of this matter, for use as evidence for Plaintiff.

7 **PURSUANT TO CODE OF CIVIL PROCEDURE §1987, THIS NOTICE**
8 **HAS THE SAME FORCE AND EFFECT AS A SUBPOENA DUCES TECUM.**

9 Dated: August 7, 2012

JOSEPH D. SCHLEIMER
ATTORNEY AT LAW

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13 BY: 
14 Joseph D. Schleimer, Attorney for
15 Plaintiff Sam Lutfi
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RENEWED Notice to Produce Britney Spears as Trial Witness
and Demand for Production of Documents at Trial
LASC No. BC406904

1 **Exhibit "A"**

2 **Documents to be Produced by James Parnell Spears,**
3 **Andrew Wallet and Britney Spears at Trial**

4 **Demand for Production No. 1**

5 The original of all of the pre-marked exhibits in this case.

6 **Demand for Production No. 2:**

7 The DRUG TEST REPORTS concerning Britney Spears covering the
8 period October 1, 2007 through March 1, 2008.

9 "DRUG TEST REPORT," as used in these document demands,
10 refers to any DOCUMENT written by or memorializing information
11 supplied by any individual, entity or laboratory engaged to take a
12 sample, analyze a sample, or report on laboratory analysis of a
13 human drug test.

14 **Demand for Production No. 3:**

15 The BABY MONITOR REPORTS which refer to Plaintiff Sam Lutfi
16 prepared between October 1, 2007 and March 1, 2008.

17 "BABY MONITOR REPORT," as used in these Demands for
18 Production, refers to any DOCUMENT written by or memorializing
19 information supplied by individuals retained to monitor the
20 mothering activities of Britney Spears, the care and custody of
21 Britney Spears' children, and/or conditions or activities taking
22 place in Britney Spears' home.

23 **Demand for Production No. 4:**

24 The documents whereby notice was given to Plaintiff Sam Lutfi by
25 Britney Spears' CONSERVATORS that the contract between Sam Lutfi and
26 Britney Spears was terminated.

27 "CONSERVATORS" refers to the court-appointed
28 conservators of Britney Spears.

1 "DOCUMENT," as used in these Demands for Production,
2 means the original and all copies of handwriting, typewriting,
3 printing, photostating, photographing, photocopying, electronic or
4 facsimile transmission, electronically stored data, every other
5 means of recording information, and any and all forms of
6 communication or representation, including letters, words,
7 pictures, sounds or symbols, or combinations thereof, and any
8 record thereby created, regardless of the manner in which the
9 record has been stored and includes (but is not limited to) any
10 and all "writings" as defined in Evidence Code §250.

11 **Demand for Production No. 5:**

12 The FINANCIAL RECORDS covering the ARTISTIC, ENDORSEMENT
13 AND MERCHANDISING INCOME OF BRITNEY SPEARS for the period June 1,
14 2007 through October 31, 2011.

15 "FINANCIAL RECORDS" means ledgers, income and expense
16 reports, and profit and loss statements; any and all contracts with and
17 accountings or statements to or from record companies; any and all
18 contracts with and accountings or statements to or from music
19 publishers; any and all contracts with and accountings or statements to
20 or from concert producers or tour promoters; any and all contracts with
21 and accountings or statements to or from product endorsees; any and
22 all contracts with or accountings and statements to or from artist
23 managers; any and contracts with and accountings or statements to or
24 from talent agents; any and all contracts with and accountings or
25 statements to or from business managers; any and all contracts with
26 and accountings or statements to or from accountants; all accountings
27 or statements prepared by or for the CONSERVATORS; and all
28 accountings or statements filed by or for the CONSERVATORS with the

1 Los Angeles Superior Court.

2 "ARTISTIC, ENDORSEMENT AND MERCHANDISING INCOME OF
3 BRITNEY SPEARS" means income stemming from the artistic,
4 entertainment, product endorsement or merchandising activities, work
5 product, engagements, and related activities of Britney Spears, whether
6 received directly by her or through one of her corporations or other
7 business entities. "ARTISTIC, ENDORSEMENT AND MERCHANDISING
8 INCOME OF BRITNEY SPEARS" includes (but is not limited to) any and
9 all income generated by Britney Spears' past or present artistic,
10 entertainment, product endorsement or merchandising services, work
11 product or licensing in any aspect of the entertainment, creative,
12 product endorsement and merchandising industries, including (but not
13 limited to), singing, composing, recording, performing, touring, dancing,
14 scoring, designing, posing, conducting, acting, writing, directing,
15 producing, painting, drawing, creating, filming, photographing,
16 videotaping, making personal appearances, endorsing, licensing,
17 marketing and merchandising. "ARTISTIC, ENDORSEMENT AND
18 MERCHANDISING INCOME OF BRITNEY SPEARS" includes (but is not
19 limited to) advances, royalties, participations, earnings, fees, or salary;
20 receipt of any partnership interest, stock, units or any other interest in
21 a business or venture; bonuses, shares of profit, valuable perquisites,
22 and any share of gross receipts; any share of net receipts, music
23 publishing income, residuals, reuse fees, recording funds, license fees,
24 tour support, or business gifts; and any in-kind income or other
25 considerations of any kind or nature whatsoever earned or received
26 directly or indirectly by Britney Spears, individually or through a
27 corporation or other business entity.
28

1 **Demand for Production No. 6:**

2 The ledgers, income and expense reports, and profit and loss
3 statements PERTAINING TO BRITNEY SPEARS for the period June 1, 2007
4 through October 31, 2011.

5 **Demand for Production No. 7:**

6 The ledgers, income and expense reports, profit and loss statements, r
7 accountings and financial statements PERTAINING TO BRITNEY SPEARS
8 prepared by and for the CONSERVATORS pertaining to the periods from June
9 1, 2007 through October 31, 2011.

10 "PERTAINING TO BRITNEY SPEARS" means related to Britney
11 Spears, whether she is doing business personally or through one of her
12 corporations or other business entities.

13 **Demand for Production No. 8:**

14 The accountings and statements PERTAINING TO BRITNEY SPEARS
15 filed by the CONSERVATORS with the Los Angeles Superior Court for the
16 periods June 1, 2007 through October 31, 2011.

17 **Demand for Production No. 9:**

18 The accountings, reports, disbursements and statements from record
19 companies PERTAINING TO BRITNEY SPEARS for the periods June 1, 2007
20 through October 31, 2011.

21 **Demand for Production No. 10:**

22 The accountings, reports, disbursements and statements from music
23 publishers PERTAINING TO BRITNEY SPEARS for the periods June 1, 2007
24 through October 31, 2011.

25 **Demand for Production No. 11:**

26 The accountings, reports, disbursements and statements from licensees
27 PERTAINING TO BRITNEY SPEARS for the periods June 1, 2007 through
28 October 31, 2011.

1 **Demand for Production No. 12:**

2 The accountings, reports, disbursements and statements from product
3 endorsees PERTAINING TO BRITNEY SPEARS for the periods from June 1,
4 2007 through October 31, 2011.

5 **Demand for Production No. 13:**

6 The accountings, reports, disbursements and statements from
7 merchandisers PERTAINING TO BRITNEY SPEARS for the periods from June
8 1, 2007 through October 31, 2011.

9 **Demand for Production No. 14:**

10 The accountings, reports, disbursements and statements from
11 marketers PERTAINING TO BRITNEY SPEARS for the periods from June 1,
12 2007 through October 31, 2011.

13 **Demand for Production No. 15:**

14 The accountings, reports, disbursements and statements for Britney
15 Spears' artist managers for the periods June 1, 2007 through October 31,
16 2011.

17 **Demand for Production No. 16:**

18 The accountings, reports, disbursements and statements from talent
19 agents PERTAINING TO BRITNEY SPEARS for the periods June 1, 2007
20 through October 31, 2011.

21 **Demand for Production No. 17:**

22 The accountings, reports, disbursements and statements from personal
23 appearance producers and promoters PERTAINING TO BRITNEY SPEARS for
24 the periods June 1, 2007 through October 31, 2011.

25 **Demand for Production No. 18:**

26 The accountings, reports, disbursements and statements from business
27 managers PERTAINING TO BRITNEY SPEARS for the periods June 1, 2007
28 through October 31, 2011.

RENEWED Notice to Produce Britney Spears as Trial Witness
and Demand for Production of Documents at Trial
LASC No. BC406904

1 **Demand for Production No. 19:**

2 Any and all accountings, reports, disbursements or statements to or
3 from accountants PERTAINING TO BRITNEY SPEARS related to any period
4 from June 1, 2007 through October 31, 2011.

5 **Demand for Production No. 20:**

6 Any and all accountings, reports, disbursements or statements to or
7 from tour promoters PERTAINING TO BRITNEY SPEARS related to any period
8 from June 1, 2007 through October 31, 2011.

9 **Demand for Production No. 21:**

10 Any and all accountings, reports, disbursements, or statements
11 pertaining to any touring or live performance activity by Britney Spears
12 related to any period from June 1, 2007 through October 31, 2011.

13 **Demand for Production No. 22:**

14 Any and all accountings, reports, disbursements, or statements from
15 television broadcasters PERTAINING TO BRITNEY SPEARS related to any
16 period from June 1, 2007 through October 31, 2011.

17 **Demand for Production No. 23:**

18 Any and all accountings, reports, disbursements, or statements related
19 to personal appearances by Britney Spears between June 1, 2007 and
20 October 31, 2011.

21 **Demand for Production No. 24:**

22 Any and all CONTRACTS with record companies PERTAINING TO
23 BRITNEY SPEARS which were OPERATIVE at any time during the period June
24 1, 2007 through October 31, 2011.

25 "CONTRACTS" means any DOCUMENTS which constitute, evidence or
26 memorialize any oral or written agreement.

27 "OPERATIVE" means having some force and effect. For example, a
28 contract which has been fully performed on one side but still obligates the

1 other party to make payments or perform in some fashion is still OPERATIVE.
2 Similarly, a contract which has been fully performed on both sides but still
3 has some contingency which might result in a further obligation of
4 performance is still OPERATIVE.

5 **Demand for Production No. 25:**

6 Any and all CONTRACTS with music publishers PERTAINING TO
7 BRITNEY SPEARS which were OPERATIVE at any time during the period June
8 1, 2007 through October 31, 2011.

9 **Demand for Production No. 26:**

10 Any and all CONTRACTS with concert producers PERTAINING TO
11 BRITNEY SPEARS which were OPERATIVE at any time during the period June
12 1, 2007 through October 31, 2011.

13 **Demand for Production No. 27:**

14 Any and all CONTRACTS with product endorsees PERTAINING TO
15 BRITNEY SPEARS which were OPERATIVE at any time during the period June
16 1, 2007 through October 31, 2011.

17 **Demand for Production No. 28:**

18 Any and all CONTRACTS with merchandisers PERTAINING TO BRITNEY
19 SPEARS which were OPERATIVE at any time during the period June 1, 2007
20 through October 31, 2011.

21 **Demand for Production No. 29:**

22 Any and all CONTRACTS with marketers PERTAINING TO BRITNEY
23 SPEARS which were OPERATIVE at any time during the period June 1, 2007
24 through October 31, 2011.

25 **Demand for Production No. 30:**

26 Any and all CONTRACTS with tour promoters PERTAINING TO
27 BRITNEY SPEARS which were OPERATIVE at any time during the period June
28 1, 2007 through October 31, 2011.

1 **Demand for Production No. 31:**

2 Any and all CONTRACTS with artist managers PERTAINING TO
3 BRITNEY SPEARS which were OPERATIVE at any time during the period June
4 1, 2007 through October 31, 2011.

5 **Demand for Production No. 32:**

6 Any and all CONTRACTS with talent agents PERTAINING TO BRITNEY
7 SPEARS which were OPERATIVE at any time during the period June 1, 2007
8 through October 31, 2011.

9 **Demand for Production No. 33:**

10 Any and all CONTRACTS with business managers PERTAINING TO
11 BRITNEY SPEARS which were OPERATIVE at any time during the period June
12 1, 2007 through October 31, 2011.
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1 **PROOF OF SERVICE**
2 **BY FAX & U.S. MAIL**

3 I am employed in the County of Los Angeles, State of California. I am
4 over the age of 18 and not a party to the within action. My business address
5 is 9401 Wilshire Boulevard, Suite 1250, Beverly Hills, California 90212.

6 On ***August 7, 2012** I served the foregoing document described as: *
7 **RENEWED NOTICE TO PRODUCE BRITNEY SPEARS, JAMES PARNELL**
8 **SPEARS AND ANDREW WALLET AS WITNESS AT TRIAL -and-**
9 **DEMAND FOR PRODUCTION OF DOCUMENTS AT TRIAL [C.C.P. §1987]**
10 * on the interested parties in this action by placing a true copy thereof
11 enclosed in sealed envelopes addressed as follows:

12 See attached service list

13 **BY U. S. MAIL**

14 I deposited the sealed envelopes in the United States mail at Beverly
15 Hills, California, addressed as stated above. The envelopes were mailed
16 with first class postage thereon fully prepaid.

17 **BY TELECOPIER:**

18 I transmitted a copy of this document by telecopier to each of the fax
19 numbers set forth on the service list.

20 Executed on ***August 7, 2012*** at Beverly Hills, California.

21 (State) I declare under penalty of perjury under the laws of the
22 State of California that the above is true and correct.

23 Joseph D. Schle
24 Type or Print Name

25 [Signature]
26 Signature

Service List
Lutfi v Spears

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Conservator of the Estate of Britney
Spears*

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RENEWED Notice to Produce Britney Spears as Trial Witness
and Demand for Production of Documents at Trial
LASC No. BC406904

TRANSMISSION VERIFICATION REPORT

TIME : 08/07/2012 17:51
NAME : J.D. SCHLEIMER
FAX : 3102739809
TEL : 3102739807
SER.# : K8J788349

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FAX NO./NAME
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PAGE(S)
RESULT
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08/07 17:49
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OK
STANDARD
ECM

TRANSMISSION VERIFICATION REPORT

TIME : 08/07/2012 17:55
NAME : J.D. SCHLEIMER
FAX : 3102739809
TEL : 3102739807
SER.# : K8J788349

DATE, TIME	08/07 17:53
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DURATION	00:02:12
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